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June 8, 2010

VIA E-FILING

Jocelyn D. Boyd, Esquire  
Chief Clerk and Administrator  
Public Service Commission of South Carolina  
101 Executive Center Dr., Suite 100  
Columbia, SC 29210

RE: Genesis Telecommunications, LLC v. United Telephone Company  
of the Carolinas d/b/a Embarq  
Docket No. 2009-311-C

Dear Ms. Boyd:

This letter is in reply to Genesis's letter objecting to CenturyLink's request that the Commission accept CenturyLink's Late-filed Exhibit, filed with the Commission on May 26, 2010. Genesis's objections are without merit and the Commission should accept the Late-filed Exhibit as requested by CenturyLink.<sup>1</sup>

The Late-filed Exhibit was submitted to clarify the record regarding whether the industry standards attached to Mr. Showers' direct testimony were the standards referenced in Section 45.8.7 of Part E of the parties' interconnection agreement (Hearing Exhibit 1). In response to cross-examination at the hearing, Mr. Showers responded that the standards were, indeed, the applicable standards under the interconnection agreement (Hearing Tr. 73-77). However, upon further questioning by Genesis's counsel, Mr. Showers indicated that his answer regarding the specific T1E1.4 group referenced in the agreement was subject to check (Hearing Tr. 76, lines 5-6). Further checking of the referenced standards confirms that Mr. Showers was correct. The Late-filed Exhibit merely seeks to place this confirmation upon check into the record, so there will be no confusion regarding the record evidence upon which the Commission must base its decision.

Specifically, page Roman numeral x of ANSI Standard T1.418-2000 (Document 1 of the Late-filed Exhibit) shows that that ANSI standard was developed by the T1E1.4 group (which is a subset of the ANSI T1 Committee, charged with developing various telecommunications technical standards). Page 2 of Document 1 shows that the two standards attached to Mr. Showers' testimony

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<sup>1</sup> CenturyLink mistakenly designated the Late-filed Exhibit as No. 6. It should have been numbered consecutively as Exhibit 5.

are incorporated by reference and made a part of the T1.418-2000 standard. As indicated, Document 1 was subsequently revised. CenturyLink has included the first several pages of ATIS-0600418.2002 (R2008) (Document 2), which is the current standard, to show that the connection between the standards attached to Mr. Showers' testimony and the ANSI standard included in Document 1 remains the same (Page 2 of Document 2).

The Late-filed Exhibit is offered solely for the purpose of clarifying the record regarding Mr. Showers' testimony "subject to check." UNEs and interconnection arrangements between ILECs and CLECs are comprehensively regulated by the federal law and rules and by this Commission. As such, the Commission is charged with making decisions appropriately based on the many regulations and complex technical standards that apply to the relationships between carriers. It is important that the Commission's decision be based upon a full and clear understanding of these regulations and standards, and that the Commission not be constrained by excluding necessary evidence that provides a complete picture of the governing standards. Therefore, CenturyLink respectfully requests that the Commission grant its request to submit its Late-filed Exhibit.

If counsel or you should have questions, please feel free to contact me.

Sincerely,

ELLIOTT & ELLIOTT, PA



Scott Elliott

SE/jcl

cc: All parties of record  
Susan S. Masterton, Esquire

### CERTIFICATE OF SERVICE

The undersigned employee of Elliot & Elliott, P.A. does hereby certify that she has served below listed parties with a copy of the pleading(s) indicated below by mailing a copy of same to them in the United States mail, by regular mail, with sufficient postage affixed thereto and return address clearly marked on the date indicated below. Since Genesis Telecommunications, LLC did not identify a counsel of record, the copy has been served on its corporate representative.

RE: Genesis Telecommunications, LLC, Complainant/Petitioner v.  
United Telephone Company of the Carolinas d/b/a Embarq,  
Defendant/Respondent

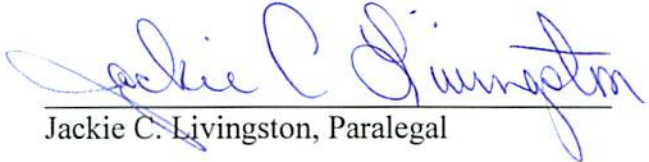
DOCKET NO. 2009-311-C

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PLEADING: LETTER IN REPLY DATED JUNE 8, 2010

June 8, 2010

  
Jackie C. Livingston, Paralegal